

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Melissa L Cecolini : CASE NO.: 19-17459-mdc
:
Debtor. : CHAPTER 7

Melissa L. Cecolini, :
: MOTION FOR REDEMPTION
Movants, : 11 U.S.C § 722
:
v. : **HEARING DATE: March 4, 2020**
: **HEARING TIME: 12:30 pm**
Prudential Bank : **HEARING PLACE: Courtroom No. 1**
1834 W. Oregon Ave. : **The Gateway Building**
Philadelphia PA 19145 : **201 Penn Street**
: **Reading, PA 19601**
Respondent. :

MOTION TO REDEEM PERSONAL PROPERTY PURSUANT TO 11 U.S.C. § 722

Now come (s) the Debtor(s) by and through counsel, and moves the court pursuant to 11 U.S.C. 722 and Bankruptcy Rule 6008 for a Redemption Order on the following grounds:

1. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as follows: 2002 Skyline Manufactured Home.
2. The interest of the Debtor(s) in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of Prudential Bank ("Creditor")) is a dischargeable consumer debt.
3. The allowed secured claim of said Creditor for purposes of redemption, the "redemption value", should be determined to be not more than \$21,428 based upon both the Debtor's value estimate and NADA valuation when considering condition adjustment.
4. Arrangements have been made by the Debtor(s) to pay to the said Creditor up to the aforesaid amount in a lump sum from exempt funds should this motion be granted.

WHEREFORE, the Debtor(s) request (s) the Court to order the said Creditor to accept from the Debtor(s) the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtor(s) requests the Court to determine the value of the property as of the time of the hearing on such objection.

Date: February 6, 2020

Respectfully submitted,
/s/ Patrick J. Best
Patrick J. Best, Esq.
ARM Lawyers
18 N. 8th St.
Stroudsburg PA 18360
570-424-6899